

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

STATE/RANDOLPH, LLC, by MID-  
AMERICA ASSET MANAGEMENT,  
INC., its agent,

Plaintiff,

vs.

OLD NAVY, LLC,

Defendant.

No. \_\_\_\_\_

To: Andrew J. Annes  
SATC Law  
222 West Adams, Suite 3050  
Chicago, IL 60606

**NOTICE OF REMOVAL**

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. § 1446, Defendant Old Navy, LLC, by its undersigned counsel, removed this matter from the Circuit Court of Cook County, Illinois to this Court based on diversity of citizenship (28 U.S.C. § 1332). In support of Defendant's Notice of Removal, Defendant states:

1. On July 21, 2020, Plaintiff State/Randolph, LLC by Mid-America Asset Management, Inc., its agent, filed a civil action in the Circuit Court of Cook County, Illinois which was styled State/Randolph, LLC v Old Navy, LLC, case no. 2020 M1 705453 (the "Action"). A copy of the Verified Complaint For Eviction ("Complaint") is attached hereto as Exhibit 1.

2. Defendant received the Complaint on July 23, 2020.

3. Plaintiff is a limited liability company; the sole member of which is Robertson Capital, Ltd. Robertson Capital, Ltd. is an Illinois corporation with its principal place of business in Illinois. Mid-America Asset Management, Inc. is an Illinois corporation with its principal place of business in Illinois.

4. Defendant Old Navy, LLC is a limited liability company; the sole member of which is The Gap, Inc. The Gap, Inc. is a Delaware corporation with its principal place of business in California.

5. Therefore, Plaintiff and Defendant are citizens of different States.

6. The Complaint seeks to recover damages in excess of \$620,000 and evict Defendant from certain retail premises.

7. Because there is a diversity in citizenship and the amount in controversy, exclusive of interest and costs, exceeds the sum or value of \$75,000, this Court has original jurisdiction over this matter. 28 U.S.C. § 1332(a)(1).

OLD NAVY, LLC

By: /s/ Charles A. Valente  
One of Its Attorneys

Charles A. Valente (ARDC No. 6198718)  
cvalente@kaplansaunders.com  
Isaiah A. Fishman (ARDC No. 629280)  
ifishman@kaplansaunders.com  
KAPLAN SAUNDERS VALENTE & BENINATI, LLP  
500 N. Dearborn St., Second Floor  
Chicago, IL 60654  
(312) 755-5700